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Walmart Inc.*

**UNITED STATES DISTRICT COURT**

**DISTRICT OF NEVADA**

JESSICA LIS,

Plaintiff,

vs.

WALMAR INC. and DOES I through X,  
inclusive,

Defendant(s).

Case No.: 2:20-cv-01324-JCM -EJY

**STIPULATION AND ~~PROPOSED~~**  
**ORDER TO EXTEND DISCOVERY**  
**DEADLINES**

**FOURTH REQUEST**

Plaintiff JESSICA LIS (hereinafter “Plaintiff”) and Defendant WALMART INC. (hereinafter “Defendant” or “Walmart”), by and through their respective counsel of record, do hereby stipulate to extend the remaining deadlines in the current scheduling order and discovery plan in this matter for a period of ninety (90) days for the reasons explained herein.

Pursuant to Local Rule 6-1(b), the parties hereby aver that this is the fourth such discovery extension requested in this matter.

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**DISCOVERY COMPLETED TO DATE**

- The parties have conducted an FRCP 26(f) conference and have served their respective FRCP 26(a) disclosures;
- The parties have filed all required documents pursuant to ECF 2 to date;
- Plaintiff has provided provider specific authorizations;
- Defendant has served written discovery to Plaintiff and Plaintiff has submitted timely responses;
- Plaintiff has served upon Defendant written discovery and Defendant has submitted timely responses;
- Deposition of Plaintiff;

**DISCOVERY TO BE COMPLETED AND REASONS FOR EXTENSION OF DISCOVERY**

Discovery to be completed includes:

- Depositions of Plaintiff's treating physicians;
- Depositions of fact witnesses;
- Disclosure of experts by both parties;
- Depositions of expert witnesses and rebuttal expert witnesses; and
- Plaintiff to notice Defendant's 30(b)(6) deposition.

The parties aver, pursuant to Local Rule 6-1, that good cause exists for the requested extension.

The parties agree that, pending this Court's approval, extension of remaining discovery deadlines is appropriate, as the parties are attempting to settle this matter prior to the deadline for expert disclosures. As the deadline for expert disclosures is approaching, the parties have agreed that additional time would be required to attempt to settle this matter. Accordingly, the parties have agreed to a 90-day discovery extension in order to participate in the settlement conference prior to incurring additional fees and cost on retaining experts.

The parties have acted in good faith to request this extension and have no intent, nor reason, to delay the resolution of this matter.

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**[PROPOSED] NEW DISCOVERY DEADLINES**

**Expert Disclosure Deadline:**

Currently: April 30, 2021

Proposed: **July 29, 2021**

**Rebuttal Expert Disclosure Deadline:**

Currently: May 31, 2021

Proposed: **August 30, 2021**

**Last Day to Amend Pleadings or Add Parties:**

Currently: March 31, 2021

Proposed: **June 29, 2021 (90 days prior to discovery cutoff)**

**Discovery Cut-Off Date:**

Currently: June 29, 2021

Proposed: **September 27, 2021**

**Dispositive Motion Deadline:**

Currently: July 27, 2021

Proposed: **October 25, 2021**

**Proposed Joint Pre-Trial Deadline:**

Currently: August 24, 2021

Proposed: **November 22, 2021**

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If this extension is granted, all anticipated additional discovery should be concluded within the stipulated extended deadline. The parties aver that this request for extension of discovery deadlines is made by the parties in good faith and not for the purpose of delay.

DATED this 5th day of April, 2021.

**TINGEY & TINGEY**

*/s/ Justin L. Dewey*

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*Attorneys for Plaintiff*  
*Jessica Lis*

DATED this 5th day of April, 2021.

**PHILLIPS, SPALLAS & ANGSTADT LLC**

*/s/ Latisha Robinson*

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*Walmart Inc.*

**IT IS SO ORDERED:**

  
**UNITED STATES MAGISTRATE JUDGE**

**DATED: April 5, 2021**